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March 16, 2020

**VIA ECF**

Hon. Sarah L. Cave  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: **Dominquez v. Ashley Stewart, Inc. 19-CV-10813 (PAE)(SLC)**

Dear Magistrate Judge Cave:

This firm represents Defendant Ashley Stewart, Inc., in the above referenced action. Ashley Stewart respectfully requests that this case be stayed pending the resolution of the motions to dismiss in virtually identical cases filed on behalf of individual plaintiffs on behalf on themselves and a purported class of similarly situated individuals in this in this district, such as:

- Mendez v. Papa John's USA, Inc., 1:19-cv-9892 (Furman, J.)
- Matzura v. Seven For All Mankind, LLC, No. 1:19-cv-10141 (Koetl, J.)
- Lopez v. Arby's Franchisor, LLC, No. 1:19-cv-10074 (Broderick, J.)
- Mendez v. Lane Bryant, No. 1:19-cv-10772 (Vyskocil, J.)

Ashley Stewart believes that a stay of the proceedings will serve the interest of judicial economy and will help to conserve both the Court's and the parties' time and resources. Ashley Stewart believes that the ruling in these related cases will help to clarify and possibly narrow the issues in this case. .

Orders to stay have been entered in other cases involving the same claims, including other claims brought Mr. Delaruz:

- Delacruz v. Five Below, Inc., Case No. 19-cv-10294 (Abrams, J.) (ECF No. 16), and
- Calcano v. Domino's Pizza, Inc., Case No. 1:19-cv-09823 (Woods, J.) (ECF 24)

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- Calcano v. Drybar Holdings LLC, Case No. 1:19-cv-11389 (Caproni, J.) (ECF No. 10)

Plaintiff's counsel consents to this request for stay.

Respectfully submitted,

*/s/ Daniella Adler*

Daniella Adler

cc: All Counsel (via ECF)

Defendant's Letter-Motion to stay this action (ECF No. 13) is GRANTED. This action is stayed until **Tuesday, August 4, 2020**. The Clerk of Court is respectfully directed to close ECF No. 13.

SO-ORDERED 3/17/2020

  
SARAH L. CAVE  
United States Magistrate Judge